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LETTER FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING  
DRAFT-FINAL RCRA FACILITY INVESTIGATION ADDENDUM SOLID WASTE  
MANAGEMENT UNITS 8, 9, 11 AND 51 (SWMU8) (SWMU9) (SWMU11) (SWMU51) NS  
MAYPORT FL  
9/19/2011  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

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Jennifer Carroll  
Lt. Governor

Herschel L. Vinyard Jr.  
Secretary

September 19, 2011

Naval Facilities Engineering Command Southeast  
Attn: Mr. Brian Syme (OPC6)  
135 Ajax Street North, Building 903  
Naval Air Station Jacksonville  
Jacksonville, Florida 32212-0030

**RE: Draft-Final Resource Conservation and Recovery Act Facility Investigation  
Addendum, SWMUs 8, 9, 11, and 51, Naval Station Mayport, USEPA ID #FL9  
170 024 260, Mayport, Florida (Tetra Tech NUS, Inc., July 11, 2011)**

Dear Mr. Syme:

I have reviewed the subject document which was dated July 8, 2011 and was received on July 12, 2011. This report was prepared under Contract Task Order Number 0033. According to the document *"Tetra Tech NUS, Inc. (Tetra Tech) has prepared this Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Addendum to summarize recent field activities conducted to complete the RFI for Solid Waste Management Units (SWMUs) 8, 9, 11, and 51."* Also, *"The objective of the RFI Addendum for SWMUs 8, 9, 11, and 51 was to complete the RFI by performing the following: 1) Identify and define the extent of contaminated soils and identifying potential source areas in connection with SWMUs 8, 9, 11, and 51 that exceed applicable Florida Department of Environmental Protection (FDEP) regulations, 2) Characterize the extent of groundwater contamination related to SWMUs 8, 9, 11, and 51 that exceeds regulatory criteria, and 3) Collect supporting data to evaluate potential risk at the site and make recommendations for subsequent corrective actions."*

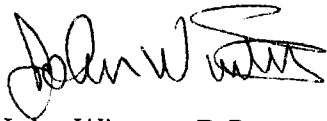
In the Conclusions and Recommendations section of this report it states *"The RFI Addendum soil sampling results indicate the extent of soil impacts exceeding applicable SCTLs and/or BSVs (Background Screening Values) had been defined for each SWMU."* The report goes on to state *"The RFI Addendum groundwater sampling results indicate the movement of groundwater impacts is stable and not migrating to the St. Johns River. Land use controls and groundwater use restrictions are maintained at these SWMUs, and continued periodic groundwater monitoring is sufficient to monitor the potential threat to human or ecological receptors."* The recommendation in the report states *"The recommendation for SWMUs 8, 9, 11, and 51 is to proceed with a Corrective Measures Study to define the most appropriate corrective action."*

Naval Station Mayport  
Draft-Final RFI Addendum, SWMUs 8, 9, 11 and 51  
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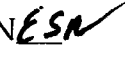
While I'm not in agreement with the Tetra Tech's conclusion that the "*soil sampling results indicate the extent of soil impacts exceeding applicable SCTLs and/or BSVs had been defined for each SWMU,*" I am in concurrence with the stated recommendation in this RFI Addendum which is to proceed to a CMS to define the most appropriate corrective action. After having evaluated Figure 3-4 (Soil Sample Exceedance Tag Map, SWMU 51) and the data presented for SWMU 51, I believe there are several data gaps in the soil boring exceedances in the north, northeast, and southwest directions at the site. Additional soil analytical data is needed to accurately draw the "Residential SCT line". Hopefully, this data has already been collected and just needs to be presented on the figure. If not, then additional soil sampling will be required to delineate the residential SCTLs exceedances in soil.

Thank you for the opportunity to review this document. If you require additional clarification or other assistance, please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.  
Remedial Project Manager

JJC  ESN 

cc Tim Bahr, FDEP, Tallahassee